



Third West Air Monitor Result Shepherd, Michael

Joyce Ackerman, 'Craig Bamitz (cbamitz@utah.gov)' 04/25/2012 03:56 PM

**Hide Details** 

From: "Shepherd, Michael" < Michael. Shepherd@rockymountainpower.net>

To: Joyce Ackerman/R8/USEPA/US@EPA, "'Craig Bamitz (cbamitz@utah.gov)'" <cbamitz@utah.gov>

1 Attachment



234381-1.pdf

Joyce & Craig,

We had our first positive hit on Monday, April 23, 2012 of Libby Amphibole, see the attached. Monday was a very warm day with a little breeze at the site. The contractor did water the ground that day. There was no unusual activity in the exclusion zone. Please let me know if you have any questions or concerns.

Thanks,

Mike Shepherd Project Manager Rocky Mountain Power - Major Projects 801.220.4584 Office 801.631.1310 Cell 801.220.2797 Fax michael.shepherd@pacificorp.com



April 25, 2012

Laboratory Code:

**RES** 

Subcontract Number:

NA

Laboratory Report: Project # / P.O. #

RES 234381-1 None Given

Project Description:

3rd West Sub - RMP

Eldon Romney R & R Environmental 47 West 9000 South #2 Sandy UT 84070

Dear Customer,

Reservoirs Environmental, Inc. is an analytical laboratory accredited for the analysis of Industrial Hygiene and Environmental matrices by the National Voluntary Laboratory Accreditation Program (NVLAP), Lab Code 101896-0 for Transmission Electron Microscopy (TEM) and Polarized Light Microscopy (PLM) analysis and the American Industrial Hygiene Association (AIHA), Lab ID 101533 - Accreditation Certificate #480 for Phase Contrast Microscopy (PCM) analysis. This laboratory is currently proficient In both Proficiency Testing and PAT programs respectively.

Resen/oirs Environmental, Inc. has analyzed the following samples for asbestos content as per your request. The analysis has been completed in general accordance with the appropriate methodology as stated in the attached analysis table. The results have been submitted to your office.

RES 234381-1 is the job number assigned to this study. This report is considered highly confidential and the sole property of the customer. Reservoirs Environmental, Inc. will not discuss any part of this study with personnel other than those of the client. The results described in this report only apply to the samples analyzed. This report must not be used to claim endorsement of products or analytical results by NVLAP or any agency of the U.S. Government. This report shall not be reproduced except in full, without written approval from Reservoirs Environmental, Inc. Samples will be disposed of after sixty days unless longer storage is requested. If you have any questions about this report, please feel free to call 303-964-1986.

Sincerely.

Jeanne Spencer Orr

President

#### RESERVOIRS ENVIRONMENTAL, INC.

NVLAP Lab Code 101896-0; TDH: #30-0015

#### TABLE I. TEM AIR FILTER SAMPLE DATA AND ANALYTICAL RESULTS

RES Job Number:

RES 234381-1

Client:

R & R Environmental

Client Project Number / P.O.:

None Given

Client Project Description: Date Samples Received:

3rd West Sub - RMP

Analysis Type:

April 24, 2012

Turnaround:

TEM, AHERA

24 Hour

Turri	aiound			
Date	Sampl	es Aı	nalvze	d:

April 25, 2012

Client ID Number	Lab ID Nun	Lab ID Number		Air Volume Sampled	Number of Asbestos Structures Detected	Analytical Sensitivity	Asbestos Concentration	Filter Loading	
· .			(mm²)	(L)		(s/cc)	(s/cc)	(s/mm²)	
3W-042312 W	EM 8	878370	0.0900	912	, ND	0.0047	BAS	BAS	
3W-042312 N	EM 8	878371	0.1000	912	1	0.0042	0.0042	10.0	
3W-042312 E	EM 8	878 <b>3</b> 72	0.1000	846	ND	0.0046	BAS	BAS	
3W-042312 S	. EM 8	878373	0.0900	910	ND	0.0047	BAS	BAS	

NA = Not Analyzed

Filter Material = Mixed Cellulose Ester

ND = None Detected

Filter Diameter = 25 mm

BAS = Below Analyfical Sensitivity

Average Grid Opening in mm<sup>2</sup> = 0.010

Effective Filter Area = 385 sq mm

DATA QA

#### RESERVOIRS ENVIRONMENTAL, INC.

NVLAP Lab Code 101896-0; TDH: #30-0015

#### TABLE II. SUMMARY OF ANALYTICAL DATA

**RES Job Number:** 

RES 234381-1

Client:

R & R Environmental

Client Project Number / P.O.:

None Given

Client Project Description:

3rd West Sub - RMP

Date Samples Received:

April 24, 2012

Analysis Type:

TEM, AHERA

Turnaround:

24 Hour

Date Samples Analyzed:

April 25, 2012

Client ID Number	Lab ID N	umber	Asbestos Mineral	Ast	estos Str	ucture Typ	oes*	Structures >S Microns in Length	**Excluded Structures	Asbestos Structures for
			_	Fibers	Bundles	Clusters	Matrices			Concentration
3W-042312 W	EM	878370	ND	0	0	0	0	0	0	0
3W-042312 N	EM	878 <b>3</b> 71	Libby Amphibole	1	0	0	0	0	0	1
3W-042312 E	EM	878 <b>3</b> 72	ND.	0	0	0	0	0	0	0
3W-042312 S	FM	878373	ND	0	0	0	0	0	. 0	0

<sup>\*</sup>See Analytical Procedure for definitions

ND = None Detected

<sup>\*\*</sup>C = Excluded from total due to lack of confirmation

<sup>\*\*</sup>L = Excluded from total for length less than 0.5 micron (AHERA only)

<sup>\*\*</sup>A = Excluded from total due lo i ncorrect aspect ratio

Due	Date:	-25.12
Due	Time:	834h

### RELAB Reservoirs Environmental, inc.

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Salmonella, Listeria, E.coll, APC, Y & M48 Hr3-5 Da	ıy	ğ	<u>*</u>		윩	₩ Щ		١.		7 1	Quantif	Qua	, Identification,	Š	ŀ	1							
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### **Attachment I**

Key to Count Sheets Count Sheets Anaiyticai Procedures

Structures identifications consist of an Asbestos Type followed by a Structure Type

#### Asbestos Type

#### Structure Types

Α	=	Amosite	F =	Fiber
An	=	Anthophyllite	B =	Bundle
C	=	Chrysotile	C =	Cluster
Cr	=	Crocidolite	M =	Matrix
Т	=	Tremolite		

ND = no structures detected

M = other structure associated with a matrix

NAM = Non Asbestos Mineral

XGB = partly obscured by a grid bar

#### Sizing Conversion

1 length unit = 5 mm on screen = 0.278 micron

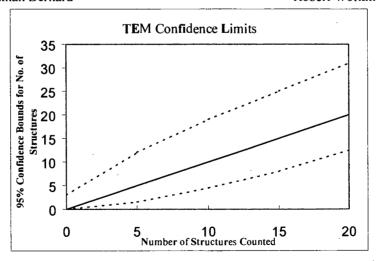
1.80 length units = 0.5 micron

18.0 length units = 5 microns

1 width unit = 1 mm on screen = 0.0556 micron

#### **TEM Analysts**

Jeanne S. Orr Nathan DelHierro Angela Heitger Jonathan Bernard Paul D. LoScalzo Mark Steiner Norberto Zimbleman Robert Workman



Upper and lower 95% confidence bounds for the number of structures counted assuming a Poisson distribution.

# Reservoirs Environmental, Inc. TEM Asbestos Structure Count

Laboratory name:	REI
instrument	JEOL 100 CX (N) S
Voltage (KV)	100 KV
Magnification	20KX 10KX
Grid opening area (mm2)	0.01
Scale: 1L=	0.28 um
Scale: 1D=	0.056 um
Primary filter area (mm2)	385
Secondary Filter Area (mm2)	
QA Type	

RAR
A
912
4/24/12
2 34381
878370

F-Factor Calculation (Indirect Preps	Only):
Fraction of primory filter used	
Total Resuspension Volume (ml)	
Volume Applied to secondary filter (ml)	

Analyzed by	JB
Analysis date	4/25/12
Method (D=Direcf, I=Indirect, IA=Indirect, ashed).	, D
Counting rules (ISO, AHERA, ASTM)	Att
Grid storage location	Month Analyzed
Scope Alignment	Date Analyzed

Grid	Grid Opening	Structure	No. of Str	uctures	Dimer	nsions	Identification	(Mineral Class				1 = yes, blank = no		
Ond	Grid Opering	o) lype i simul l		Amphibole	С_	NAM	Sketch/Comments	Sketch	Photo	EDS				
A	643	NO												
	F4-3	MD			P	) ~~~	A 90	houte	nf	5-1	המשה מים	<b>5</b>		
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Reservoirs Environmentai, I	nc.
TEM Asbestos Structure Cou	Jnt

Laboratory name:	REI
Instrument	JEOL 100 CX (N) S
Voltage (KV)	100 KV
Magnification	<b>20KX</b> 10KX
Grid opening area (mm2)	0.01
Scale: 1L =	0.28 um
Scale: 1D =	<b>9.056</b> um
Primary filter area (mm2)	385
Secondary Filter Area (mm2)	
QA Type	

Client :	Rock
Sample Type (A=Air, D=Dust):	A
Air volume (L) or dust area (cm2)	917
Date received by lab	4/24/12
Lab Job Nurnber:	2 34381
Lab Sample Number:	878371

Analyzed by	JB
Analysis date	4/25/12
Melhod (D=Direct, I=Indirect, IA=Indirect, ashed).	D
Counting nales (ISO, AHERA, ASTM)	Att
Grid storage location	Month Analyzed
Scope Alignment	Oate Analyzed

F-Pactor Calculation (Indirect Preps Only):					
Fraction of primary filter used					
Total Resuspension Volume (ml)					
Volume Applied to secondary filter (ml)					

Grid	Grid Opening	Grid Opening	Structure	No. of Str	ictures	Dimer	nsions	Identification	Mineral Class			,	1 = y	es, blank	= no
Olika	Ond Opening	Туре <sup>.</sup>	Primary	Total	Length	Width	Identification	Amphibole	С	NAM	Sketch/Comments	Sketch	Photo	EOS	
A	H2-3	ND				 									
	62-3	MD			Pm	A	80%	infant	10	% de	bris				
	F2-3	ND			Pur	B	60%	intent	10	ho de	bus				
	E2-3	MD			<b>,</b>										
	E3-6	ND									·				
B	63-4	ND				<u> </u>									
	F3-4	ND							·						
	E3-4	M													
,	H4-6	ND									l				
	G4-6	F		1	13	5	ADX	LA		16	8				

LA = Libby-type amphibole

NAM = Non-asbestos material

#### Reservoirs Environmental, Inc. TEM Aspestos Structure Count

Laboratory name:	REI
Instrument	JEOL 100 CX (N) S
Voltage (KV)	100 KV
Magnification	(20KX) 10KX
Grid opening area (mm2)	0.01
Scale: 1L =	0.28 um
Scale: 10 =	0.056 um
Primary filter area (mm2)	385
Secondary Filter Area (mm2)	
QA Type	

Client :	Rock
Sample Type (A=Air, D=Dust):	A
Air volume (L) or dust area (cm2)	846
Date received by lab	4/24/12
Lab Job Number:	2 34381
Lab Sample Number:	878372

JB
4/25/12
D
Att
Month Analyzed
Oate Analyzed

Only):

Grid	Grid Opening	Structure	No. of Structures		ctures Dimensions		identification	Mineral Class				1 = y	es, blank	= no
, Old	Ond Opening	Type	Primary	Total	Length	Width	Identification	Amphibole	С	NAM	Sketch/Comments	Sketch	Photo	EOS
A	H4-4	ND						·		!				
	G4-4	M				,		·						
	F4-4	M			Poso	s A	+B	~80%	uh	af	10% del	w's		
	<u>=4-4</u>	ND			•			16						
	04-4	ND						15	9/24	1/12				
B	14-3	ND							7					
	K4-3	ND												
	H4-3	MD				-								
	643	M												
	F4.3	M												

# Reservoirs Environmental, Inc. TEM Asbestos Structure Count

Laboratory name:	REI
Laporatory Harrie.	_
Instrument	JEOL 100 CX (N) S
Voltage (KV)	100 KV
Magnification	20KX 10KX
Grid opening area (mm2)	0.01
Scale: 1L =	0.28 um
Scale: 1D =	0.056 um
Primary filter area (mm2)	385
Secondary Filter Area (mm2)	
QA Tyoe	

7 7 (0000000 01)	
Client:	Rock
Sample Type (A=Air, D=Dust):	A
Air volume (L) or dust area (cm2)	910
Oate received by lab	4/24/12
Lab Job Number:	2 34381
Lab Sample Number:	878373

F-Factor Calculation (Indirect Preps Only): Fraction of primery filter used	
Total Resuspension Voluma (ml)	
Volune Applied to secondary filter (ml)	

Analyzed by	JB
Analysis date	4/25/12
Method (D=Oirect, l=Indirect, IA=Indirect, ashed).	
Counting rules (ISO, AHERA, ASTM)	Att
Grid storage location	Month Analyzed
Scope Alignment	Date Analyzed

	Grid	d Grid Opening	Structure	No. of Structures		Oimensions		Identification	Mineral Class				1 = yes, blank = no		
	Silu C		Туре	Prtmary	Total	Length	Width	Identification	Amphibole	· c	NAM	Sketch/Comments	Sketch	Photo	EDS
	A	K3-1	WD												
	-1B	H3-4	ND			Page	A	70%	intant	5	% de	bus			
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	,	F3-3	ND												

#### Analytical Procedures - AHERA

Transmission electron microscopy/energy dispersive X-ray spectrometry/selected area electron diffraction (TEM/EDX/SAED) was employed in the analysis of the samples, which were collected on 25 mm mixed cellulose ester air filters. A portion of each filter was collapsed with acetone and etched in a plasma asher. The etched filter was then coated with a thin layer of carbon in a carbon side down. The sample was then placed inside a condensation washer and treated with acetone to remove the filter matrix and expose any inert material.

For each sample, enough grid openings on a 200 mesh TEM grid are analyzed to ensure an analytical sensitivity of at least 0.005 structures/cc. A minimum of four grid openings from two preparations are analyzed for each sample. The grid openings are searched for fibrous structures which, if present are analyzed by SAED and/or EDX (elemental analysis). The AHERA protocol requires SAED confirmation of enough chrysotile asbestos structures on each sample to cause the sample to exceed 70 structures/mm² (usually 4 or 5 structures). Both SAED and EDX confirmation are required of enough amphibole structures on each sample to cause the sample to exceed 70 structures/mm² (usually 4 or 5 structures) per sample. Either SAED or EDX is required for the remaining asbestos structures of either type. The morphology of each structure is determined and the length and the diameter of any asbestos structures are recorded. Asbestos fibers, bundles, cluster and matrices were identified and recorded. The asbestos structures have been defined in AHERA as follows:

Fiber: is a structure having a minimum length greater than or equal to 0.5

micron with an aspect ratio of 5:1 or greater with substantially parallel

sides.

Bundle: is a structure composed of three or more fibers in parallel arrangement,

with each fiber closer than the diameter of one fiber.

Cluster: is a structure with fibers in random arrangements such that all fibers are

intermixed and no single fiber is isolated from the group.

Matrix: is a fiber or fibers with one end free and the other end embedded or

hidden by a particulate. The exposed fiber end must meet the fiber

definition given above.

If more than 50 asbestos structures are identified and confirmed on a sample, AHERA analysis may be terminated after completion of the grid opening, which contains the 50<sup>th</sup> structure. AHERA protocol requires the laboratory to reject any clearance sample which contains in excess of 25% total particulate loading or which appears to be unevenly loaded.

The AHERA protocol includes specific sampling requirements, including minimum numbers of samples and minimum air volumes. Specifically, the 70 structures/mm² clearance criteria is only allowed for sets five inside samples (collected in a group of 13 samples including: five outsides and three blanks) with volumes greater than 1200 liters (40 CFR Part 763, page 41894). Deviation from the AHERA sampling protocol may affect the validity of the analytical results. Analysis of samples collected by non-protocol methods are not accredited by NVLAP

#### Equations Used for Calculations

Area Analyzed, mm<sup>2</sup> = # GO counted x Average GO Area (mm)

Concentration,  $s/cc = \frac{\# \text{ Asbestos Structures}}{\# \text{ GO Counted}} \times \frac{1}{\text{Volume (L)}} \times \frac{\text{Eff. Filter Area (mm}^2)}{\text{Average GO area (mm}^2)} \times \frac{\text{IL}}{1000cc}$ 

Filter loading,  $s/mm^2 = \frac{\# \text{ Asbestos structures}}{\text{Area Analyzed (mm}^2)}$ 

GO = TEM grid opening